Hull and Topside Painting

Potential Environmental Impacts:

Hull and topside paints may be toxic and inhalation may cause cancer. If spilled, they may harm aquatic life and water quality. Additionally, the fumes released by some paints can contribute to air pollution.

Legal Requirements:

- A hazardous waste determination must be conducted on painting wastes and any materials used to clean up spilled paint to establish whether or not their disposal is subject to hazardous waste regulations [40 CFR 262.11; RCSA §22a-449(c)-102(a)(2)(A)]. Manage hazardous waste as described in Appendix B.
- Paint cans and other containers that have residues of hazardous (e.g., oil-based) paints must be handled as hazardous waste unless they have been "emptied," which means drained of all material that can be removed from them by normal methods (e.g., pouring or pumping), AND no more than one inch (or 3% by weight) of residue remains in the container [40 CFR 261.7]. "Emptied" containers of hazardous paints and those that have dried out residues of non-hazardous (e.g., latex) paints may be recycled as scrap metal, or disposed of in the regular trash.
- Paint or varnish (any amount) that is accidentally discharged to the ground or waters of the state must be reported to the CT-DEP's Oil and Chemical Spill Response Division at (860) 424-3338 [CGS §22a-450]. See Appendix E for more information.
- If paint or varnish that is discharged into the navigable waters of the state causes a visible sheen, it may also be necessary to report the spill to the National Response Center at (800) 424-8802 [§311 of the Clean Water Act; 33 USC 1321]. See Appendix E for more information.
- If there is a stormwater discharge from your facility, you may have to register for a *General Permit for the Discharge of Stormwater Associated with Industrial Activity* ("Stormwater General Permit"). See Appendix F for more information.

Best Management Practices:

- ✪ Store all paint in a centralized, covered area. Return all unused paints to that area and immediately and properly mange empty containers.
- ✪ Avoid the problem of having leftover paint by mixing only as much paint as is needed for a given job. Consider sharing leftover paints with customers or setting up an exchange area for customers to swap unused items.
- ✪ Limit in-water painting to interior surfaces and brightwork, where paint materials and spills can be contained and prevented from entering the water. Do not allow in-water hull scraping or any process that occurs underwater to remove paint from the boat hull.

- ✪ Although it is not advised to conduct painting while the boat is in the water, if it must be done, transfer the paint to the vessel in a small (less than one gallon), tightly covered container. Small containers mean small spills.
- ✪ Designate an upland area for debris-producing maintenance activities such as sanding and painting.
- ✪ Do as much work as possible away from the water, including mixing paints and/or cleaning brushes.
- ✪ Use tarps or drop cloths to collect drips. Weight the bottom edges of tarps and plastic sheeting to keep them in place.
- ✪ Use drip pans for all paint mixing, paint transfer, and/or equipment clean up.
- ✪ Use low-VOC, high solids content and water-based paints and surface preparation products instead of traditional paints and primers.
- ✪ Encourage the use of non-toxic, high bonding, and easily cleaned hull coatings.
- ✪ Use brushes and rollers instead of paint sprayers whenever possible, since paint spraying is potentially more wasteful and more harmful to the environment. If paint spraying must be done, see the "Paint Spraying" fact sheet.
- ✪ Reuse solvents and thinners by draining the clean product off the top once solids settle out.
- ✪ Contain and clean up spilled paint or varnish immediately.

Checklist for Clean Marina Certification:

✔ Do you conduct boat scraping, sanding, and other debris-producing maintenance in a designated upland maintenance area, where feasible?

YES **NO** **N/A**